

# **EXHIBIT A**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

CARLTON TECHNOLOGIES, INC.,	)	
	)	
Plaintiff,	)	Case No. 07 C 06757
	)	Judge Coar
v.	)	Magistrate Judge Mason
	)	
JEFFREY GRAFSTEIN	)	
and BIZ 120, INC.,	)	Trial by Jury Demanded
	)	
Defendants.	)	

**PLAINTIFF'S FIRST REQUEST FOR INSPECTION TO DEFENDANTS**

Plaintiff, Carlton Technologies, Inc. ("Carlton"), through its undersigned counsel and pursuant to Federal Rule of Civil Procedure 34, hereby requests that Defendants Jeffrey Grafstein ("Grafstein") and Biz 120, Inc. ("Biz 120") produce for inspection and imaging certain computers and other electronic devices, as described below, at the offices of Winston & Strawn LLP, 35 West Wacker Drive, Chicago, Illinois 60601, following service of this request. The purpose of this request is to allow Carlton to conduct forensic inspection and imaging of the computers and other electronic devices. Such inspection will not alter or destroy the hard drives/hard disks or any information thereon.

**DEFINITIONS**

1. The term "Computer" as used in these Requests shall include all professional and personal computers, laptop computers, desktop machines, servers, and workstations, including any Hard Drives used therein.

2. The term "Hard Drives" as used in these Requests refers to the computer mechanisms that read and write data, store electronic information, and retain the information when a computer is turned off.

3. The term "Email" as used in these Requests refers to correspondence sent or received electronically via a Computer or other electronic device.

4. The term "Backup Devices" as used in these Requests refers to removable media, including but not limited to backup tapes, CDs, DVDs, external hard drives, flash drives, storage cards, zip disks, and floppy disks.

5. The term "Remote Storage" as used in these Requests includes information stored by Grafstein or Biz 120 through a third party, including but not limited to online storage and web hosting.

#### **THINGS REQUESTED FOR INSPECTION**

1. Every Computer used by Grafstein from January 1, 2006 to the present that is/are in the possession, custody or control of Grafstein.

2. Every Computer used by Grafstein from January 1, 2006 to the present within the course and scope of his employment with Carlton.

3. Every Computer used by Grafstein or any other employee of Biz 120 from January 1, 2006 to the present within the course and scope of their employment with Biz 120.

4. All Hard Drives that contain or reflect or have contained or reflected information concerning Carlton; Carlton's business, products, services or customers; or any information that was obtained from Carlton.

5. All Email, including but not limited to deleted Email, that contain or reflect or have contained or reflected information concerning Carlton; Carlton's business, products, services or customers; or any information that was obtained from Carlton.

6. All Backup Devices that contain or reflect or have contained or reflected information concerning Carlton; Carlton's business, products, services or customers; or any information that was obtained from Carlton.

7. All Remote Storage that contain or reflect or have contained or reflected information concerning Carlton; Carlton's business, products, services or customers; or any information that was obtained from Carlton.

8. Any other electronic devices, including but not limited to Blackberries, PDAs, and cell phones, that contain or reflect or have contained or reflected information concerning Carlton; Carlton's business, products, services or customers; or any information that was obtained from Carlton.

Respectfully submitted,

CARLTON TECHNOLOGIES, INC.

By: s/ John M. Dickman  
John M. Dickman

John M. Dickman  
Ronald Y. Rothstein  
Sheila P. Frederick  
WINSTON & STRAWN LLP  
35 West Wacker Drive  
Chicago, Illinois 60601  
(312) 558-5600 (phone)  
(312) 558-5700 (fax)  
jdickman@winston.com

Attorneys for Plaintiff